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May 14, 2020

By ECF and email

The Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

5-15-2020
Bail is modified to allow travel
to the District of New Jersey.
SO ORDERED.



Re: United States v. Tagliaferro, et al.
19 Cr. 472 (PAC)

Dear Judge Crotty:

We represent Salvatore Tagliaferro in United States v. Tagliaferro, 19 Cr. 472 (PAC), and write to respectfully request a modification of Mr. Tagliaferro's pretrial conditions of release.

Earlier today we were informed that Mr. Tagliaferro has been offered employment beginning this Monday, May 18, 2020, as a construction site supervisor at American Dream Mall for Benmoore Construction Co. located in Hackensack, New Jersey. The terms of Mr. Tagliaferro's appearance bond currently limit his travel to the Southern and Eastern Districts of New York and the Middle District of Pennsylvania and all points in between necessary for such travel.

As such, in order to allow Mr. Tagliaferro to accept this job opportunity we respectfully request a modification of Mr. Tagliaferro's bail conditions by expanding his permissible travel to include the District of New Jersey, with all other conditions of his appearance bond to remain the same.

We have emailed with Pretrial Services Officer Madalyn Toledo and been informed that Pretrial Services has no objection to the instant application. We have also emailed with Assistant United States Attorney Thomas McKay and been informed that the Government defers to Pretrial Services and as such likewise has no objection.

Accordingly, Defendant Salvatore Tagliaferro, by and through counsel, respectfully requests a modification of Mr. Tagliaferro's pretrial conditions of release to permit him to expand his permissible travel to include the District of New Jersey, with all other conditions of his appearance bond to remain the same.

The Hon. Paul A. Crotty

May 14, 2020

Page 2 of 2

Thank you for your time and consideration.

Respectfully submitted,

/S/

Michael K. Bachrach

Richard H. Rosenberg

Attorneys for Defendant Salvatore Tagliaferro

cc: All parties of record (by ECF)
PTS Officer Madalyn Toledo (by email)